

EXHIBIT A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,

Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

FTX RECOVERY TRUST,

Plaintiff,

- against -

FORIS DAX MT LTD., FORIS DAX ASIA
PTE LTD., FORIS DAX, INC., and IRON
BLOCK CAPITAL,

Defendants.

Adv. Pro. No. 24-50188 (KBO)

**NINTH STIPULATION FOR AN EXTENSION OF TIME FOR
DEFENDANTS TO RESPOND TO COMPLAINT**

Plaintiff FTX Recovery Trust and Defendants Foris Dax MT Ltd., Foris DAX Asia Pte. Ltd., Foris DAX, Inc. and Iron Block Capital (collectively, the “Defendants” and together with the FTX Recovery Trust, the “Parties”), by and through their respective undersigned counsel, enter into this *Ninth Stipulation for an Extension of Time for Defendants to Respond to Complaint* (the “Stipulation”) and hereby stipulate and agree as follows:

1. On November 7, 2024, then-Plaintiff Alameda Research Ltd. (“then-Plaintiff,” and together with Defendants, the “then-Parties”) initiated the above-captioned adversary proceeding by filing the *Complaint for Turnover of Assets Pursuant to 11 U.S.C. § 542 and Disallowance of Claims Pursuant to 11 U.S.C. § 502* [Adv. D.I. 1] (the “Complaint”).

2. On November 21, 2024, Defendants Foris Dax, Inc. and Iron Block Capital were served a *Summons and Notice of Pretrial Conference in an Adversary Proceeding* [Adv. D.I. 3–4]. All Defendants have agreed to accept service of the Complaint and waive their objections, if any, to service of process.

3. On December 19, 2024, the then-Parties stipulated to extend the Defendants’ time to respond to the Complaint until January 21, 2025. [Adv. D.I. 5, 6].

4. On January 14, 2025, the then-Plaintiff served *Plaintiff’s First Set of Requests for Production of Documents* on certain Defendants, to which such Defendants responded on February 5, 2025.

5. On January 17, 2025, the then-Parties stipulated to extend the Defendants’ time to respond to the Complaint until February 7, 2025. [Adv. D.I. 9].

6. On February 7, 2025, the then-Parties stipulated to extend the Defendants’ time to respond to the Complaint until February 21, 2025. [Adv. D.I. 13].

7. On February 14, 2025, the FTX Recovery Trust was substituted for Alameda Research Ltd. as the Plaintiff in this case. [Adv. D.I. 18].

8. On February 20, 2025, the Parties stipulated to extend the Defendants’ time to respond to the Complaint until March 31, 2025. [Adv. D.I. 20].

9. On March 31, 2025, the Parties stipulated to extend the Defendants’ time to respond to the Complaint until June 30, 2025. [Adv. D.I. 26].

10. On June 25, 2025, the Parties stipulated to extend the Defendants’ time to respond to the Complaint until July 31, 2025. [Adv. D.I. 40].

11. On July 29, 2025, the Parties stipulated to extend the Defendants’ time to respond to the Complaint until August 22, 2025. [Adv. D.I. 47].

12. On August 21, 2025, the Parties stipulated to extend the Defendants' time to respond to the Complaint until September 30, 2025. [Adv. D.I. 56].

13. The Parties have been engaged in constructive discussions to resolve the Complaint and require additional time to continue such discussions.

14. The Parties have conferred regarding an agreement to further extend the Defendants' time to respond to the Complaint.

15. The Defendants' deadline to respond to the Complaint shall be extended through November 24, 2025.

16. This Stipulation is without prejudice to the rights of the Parties to seek a further extension and/or continuance as appropriate.

17. Except for defenses relating to service of process, the Defendants reserve all rights, claims, counterclaims and defenses.

Dated: September 26, 2025

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